

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

SUMNER SQUARE
1615 M STREET, N.W.
SUITE 400
WASHINGTON, D.C. 20036-3215

(202) 326-7900

FACSIMILE:
(202) 326-7999

July 7, 2020

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) concerning a sealed filing made by Saudi Arabia today seeking partial reconsideration of this Court’s Opinion & Order dated June 23, 2020, ECF No. 6290 (filed under seal).

Today’s filing contains information subject to the general MDL protective order, ECF No. 1900. The filing discusses documents that are inviolable under the Vienna Convention on Diplomatic Relations and the Vienna Convention on Consular Relations, which are properly sealed under this Court’s order of July 22, 2019, ECF No. 4696, at 8-10. Today’s filing does not contain any information subject to the Privacy Act Order and Protective Order for FBI Documents, ECF No. 4255.

Consistent with this Court’s guidance, ECF Nos. 5307, 6084, Saudi Arabia is making today’s filing under seal using the Court’s sealed ECF procedures. Consistent with part III.F of this Court’s individual practices, Saudi Arabia is filing a public, redacted version on the public docket. The proposed redactions are limited to footnote three.

Copies of Saudi Arabia’s filing (clean and with highlighted proposed redactions) are being sent today by email to Your Honor’s chambers and to counsel for Plaintiffs, the United States, and Dallah Avco. No courtesy copies of either this letter or today’s sealed filing are being sent to the chambers of Judge Daniels, as instructed by the temporary revisions to his Individual Practices in light of the ongoing public health crisis.

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

The Honorable Sarah Netburn
July 7, 2020
Page 2

Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)